

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA *

*

v. *

*

Criminal No. 20-293-PWG

DOMINIQUE BELL *

*

Defendant. *

**CONSENT MOTION TO EXTEND THE TIME FOR FILING
PRE-TRIAL MOTIONS AND REQUEST TO TOLL SPEEDY TRIAL
CLOCK**

COMES NOW, the Defendant, Dominique Bell, by and through counsel, Michael E. Lawlor, and Nicholas G. Madiou, Brennan, McKenna & Lawlor, Chtd., and hereby moves this Honorable Court to continue the time in which the Defendant can file pre-trial motions and exclude that time from the Speedy Trial calculation in this case. In support of this request, counsel states as follows:

1. Per prior Order of the Court, the Defendant's pre-trial motions were to be filed on or before August 2, 2021.

2. The Defendant respectfully asks this Court to continue the filing deadline for Defendant's motions in this case in approximately 14 days and exclude that time from the Speedy Trial calculation in this case.

3. Undersigned counsel is currently engaged in plea negotiations. Counsel asks for this brief continuance to allow those negotiations to continue.

4. This motion is unopposed. Undersigned counsel contacted Assistant United States Attorney Joseph Baldwin, and is authorized to state that the United States does not oppose this request.

WHEREFORE, for the foregoing reasons, the Defendant respectfully requests this Honorable Court continue the deadline for the Defendant to file pre-trial motions by approximately 14 days and exclude that time from the Speedy Trial calculation in this case.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 2, 2021, a copy of the foregoing was sent to the United States Attorney's Office for the District of Maryland, via ECF.

/s/

Michael E. Lawlor